

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>IN RE CHN Construction, Inc.,</b>	)	
	)	
<b>Debtor</b>	)	<b>No. 11-37995-KRH</b>
	)	<b>Chapter 11</b>
<hr style="width: 40%; margin-left: 0;"/>	)	<b>Small Business Case</b>

**APPLICATION FOR CONDITIONAL APPROVAL  
OF THE DISCLOSURE STATEMENT FOR DEBTOR'S PLAN  
OF REORGANIZATION DATED MARCH 6, 2012**

**NOW COMES** CHN Construction, LLC, the Debtor herein, (the "Debtor"), by counsel, and hereby moves the Court to conditionally approve its Disclosure Statement Dated March 6, 2012. In support thereof, the Debtor states as follows:

1. On December 22, 2011, the Debtor filed with this Court a Plan of Reorganization and a Disclosure Statement for the Debtor's Plan of Reorganization. Subsequently, the Debtor filed an amended Disclosure Statement Dated March 6, 2012 and an Amended Plan [Docket No. 86].

2. When the Debtor filed its Chapter 11 petition for relief on December 21, 2011, it was a "small business" case under 11 U.S.C. § 101(51C).

3. Pursuant to 11 U.S.C. § 1125(f)(3)(A), the Court may conditionally approve a "small business" disclosure statement and combine the hearing on the disclosure statement with the hearing on Confirmation.

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Counsel for the Debtor in Possession.

4. The Debtor now seeks conditional approval of its Disclosure Statement so it can serve the conditionally approved disclosure statement on its creditors and proceed with a vote on its Plan of Reorganization, and notice creditors on the combined hearing on the Disclosure Statement and hearing on Confirmation of the Debtor's Plan of Reorganization.

**WHEREFORE**, Debtor respectfully requests that this Court conditionally approve the Debtor's Disclosure Statement dated March 6, 2012, and set a combined hearing on the Disclosure Statement and Confirmation of the Debtor's Plan of Reorganization on May 2, 2012 at 11:00 a.m., or at such other date and time as be required, taking into account the undersigned's absence for the jurisdiction on May 3 & 4, 2012.

DATE: March 30, 2012

\s\ Douglas Scott  
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